

December 28, 2009

Mr. David Butler
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

Re: First State PAC
FEC ID No. C00363648

Dear Mr. Butler:

This is in response to your letter dated November 18, 2009, concerning the Mid-Year Report (1/1/09-6/30/09) of First State PAC (the "Committee").

You ask about the expenditures for "Catering & Office Expenses," "Catering/Facility Rental," "Catering/Travel/Event & Office Expenses," "Fundraising Consulting Expenses," and "Fundraising Consulting Services" on Schedule B. These expenditures were for the Committee's own activities and were not made on behalf of any specifically identified federal candidate.

You also ask about the payment to another political committee for goods and/or services. The Committee paid fair market value for use of office space by the Delaware Democratic Party ("the Party"). The Committee periodically uses a small space at the Party's office to conduct its political activities.

Finally, you ask about the Committee's administrative expenses. First State PAC is a small committee and has few administrative expenses. The Committee currently has no paid staff and sublets a small office, as noted above, for which it pays for its annual rent (which includes all utilities except for telephone) in advance in one payment. It relies primarily on its consultants and volunteers to administer the Committee's activities. All expenses incurred to operate the Committee, including payments to consultants, have been reported as federal operating expenditures on the Committee's FEC reports.

We hope that this information adequately addresses your questions. If you need any further information, please do not hesitate to contact the Committee.

Very truly yours,

Marc Elias
Counsel to First State PAC